

REMARKS

Claims 25-124 are pending in the application. Claims 25-59 and 97-122 stand rejected. By the above amendment, claims 60-96 and 123-124 have been canceled as being withdrawn from consideration, and claims 25 and 97 have been amended. Applicants respectfully request reconsideration of the claim rejections.

Claim Rejections - 35 U.S.C. §103

Claims 25-36, 40-59 and 97-122 stand rejected as being unpatentable over the U.S. Patent No. 5,850,629 to Holm et al. Claims 37-39 stand rejected as being unpatentable over Holm in view of Anderson. It is respectfully submitted that at the very least, Holm is legally deficient to establish a *prima facie* case of obviousness against claims 25 and 97.

At the outset, it is to be noted that the Applicants respectfully disagree with Examiner's analysis and claim rejections set forth in the Final Office Action and subsequent Advisory Action. In the Advisory Action, it appears that the Examiner has misconstrued and mischaracterized Applicants' previous arguments as to how Holm differs from the claimed inventions. At the very least, the Examiner's disagreement with Applicants' contention that Holm discloses a TTS system that provides only a GUI-based user interaction modality, underscores the impropriety of the rejection, especially in view of the express teachings of Holm which clearly contradicts the Examiner's basis of the rejection. Moreover, the Examiner's interpretation and characterization of the claimed inventions in view of Holm based on Webster's dictionary, rather than Applicants' specification and knowledge of one of ordinary skill in the art is further evidence of the impropriety of the claim rejections.

It must be reiterated that on a fundamental level, the inventions of claims 25 and 97 are *starkly different* from the teachings of Holm. Indeed, the claimed inventions are directed to systems and methods that are based on a *conversational computing* paradigm that provides conversational computing via a multi-modal conversational user interface by managing dialog and context, etc., across different platforms and devices having different user interface modalities. This concept is simply not taught by Holm.

At the very least, the Examiner's reliance on the TTS system of Holm as being a "conversational computing system" and "conversational virtual machine", is wholly misplaced. Holm expressly teaches that the TTS system can only operate over different GUI-based operating systems that provide a necessary graphical user interface (GUI) and clipboard mechanism (see, e.g., Holm Col. 3, lines 1-14). In other words, Holmes discloses a TTS system that only enables GUI-based user interaction. Moreover, Holm discloses a GUI-based operating system (i.e., based on a conventional GUI paradigm), wherein the TTS system is built solely around the GUI paradigm. Moreover, the TTS system of Holm does not provide a mechanism for providing a coordinated user interface across different active applications, etc.

Given the confusion and misapplication of the claim language to the teachings of Holm, Applicants have amended the claims in a sincere effort to clarify the distinct, apparent differences between, e.g., claims 25 and 97, and the teachings of Holm. In particular, with respect to claim 25, Holm does not disclose or suggest, e.g., *a multi-modal CUI (conversational user interface) manager, operatively connected to a plurality of I/O (input/output) renderers, which can receive input queries and input events across different user interface modalities of one or more active applications and generate output messages and output events in connection*

with the one or more active applications in one or more of the different user interface modalities, as claimed in claim 25. Moreover, with respect to claim 97, Holm does not teach, e.g., a kernel adapted to manage dialog and context, conversational engines and resources and communication across different platforms, applications, devices or combinations thereof, each having one or more different user interface modalities, to provide a coordinated, universal conversational user interface (CUI) across the different user interface modalities, as essentially claimed in claim 97.

For at least the above reasons, claims 25 and 97 are clearly distinct and non-obvious over Holm. In addition, all claims that depend from claims 25 and 97 are patentable over Holm and or Anderson at least for the same reasons given for base claims 25 and 97. Accordingly, withdrawal of the claim rejections is requested.

Respectfully submitted,



Frank V. DeRosa
Reg. No. 43,584

F. Chau & Associates, LLC
130 Woodbury Road
Woodbury, New York 11797
TEL.: (516) 692-8888
FAX: (516) 692-8889